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**JUDGE KAPLAN**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**06 CV 1304**

GLOBAL Reinsurance Corporation -  
U.S. Branch

Plaintiff,

- against -

Argonaut Insurance Company,

Defendant.

Docket No.

COMPLAINT FOR INJUNCTIVE  
RELIEF

Plaintiff GLOBAL Reinsurance Corporation - U.S. Branch  
("Global"), by its attorneys, Budd Larner, P.C., as and for its  
Complaint seeking injunctive relief against Defendant Argonaut  
Insurance Company ("Argonaut"), states as follows:

Nature of the Action

1.

REDACTED

The Parties, Jurisdiction and Venue

2. Global is a branch of a foreign reinsurance company  
organized under the laws of Germany, with its principal place of  
business in Cologne, Germany. It is authorized to write certain

insurance and reinsurance in New York, and it maintains a place of business in New York, New York.

3.

REDACTED

4. The Court has jurisdiction over this matter pursuant to 9 U.S.C. §§201-203, 28 U.S.C. §1331. Global and Argonaut entered into a series of retrocessional reinsurance contracts, which constitute commercial agreements between a citizen of a foreign country and a citizen of the United States. The arbitration clause contained in the contracts provides for arbitration to take place in New York, New York. Germany and the United States are signatories to the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, 9 U.S.C. §201 et seq.

5. In addition, this Court has subject matter jurisdiction based on diversity of citizenship pursuant to 28 U.S.C. §1332(a). There is complete diversity between Global and Argonaut, and the amount in controversy in this action exceeds the sum of \$75,000.

6.

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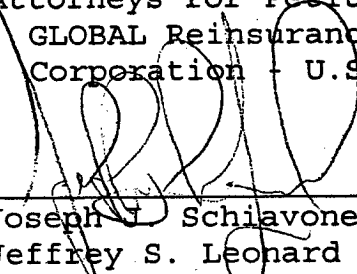
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Dated: Short Hills, New Jersey  
February 16, 2006

BUDD LARNER, P.C.  
150 John F. Kennedy Parkway  
Short Hills, New Jersey 07078  
(973) 379-4800  
Attorneys for Petitioner  
GLOBAL Reinsurance  
Corporation - U.S. Branch

BY:   
Joseph V. Schiavone (JS 7303)  
Jeffrey S. Leonard (JL 5931)  
Nahum A. Kianovsky (NK 5784)

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**Australia**

GLOBAL Life Reinsurance Company of Australia Pty. Ltd.  
Gerling House  
44 Pitt Street  
AUS- Sydney NSW 2000  
Tel.: +61 2 92 51 8055  
Fax: +61 2 92 41 3437  
Contact person: Chris Old  
E-Mail: [chris.old@ggl.com.au](mailto:chris.old@ggl.com.au)

[top](#)

**Barbados**

GLOBAL International Reinsurance Company Ltd.  
Building No. 2, Ground Floor  
Chelston Park, Collymore Rock  
St. Michael  
Barbados, W.I.  
Tel.: +1 246 228 1411  
Fax: +1 246 228 1457  
Contact person: Manoj Kamani  
E-Mail: [manojkamani@ggir.com](mailto:manojkamani@ggir.com)

[top](#)

**Canada**

GLOBAL Reinsurance Company  
Suite 1400  
480 University Avenue  
CAD- Toronto, Ontario, M5G 1V2  
Tel.: +1 416 598 4688  
Fax: +1 416 598 9244  
Contact person: Mike McConnell  
E-Mail: [Mike.McConnell@globalre.ca](mailto:Mike.McConnell@globalre.ca)

[top](#)

**France**

GLOBALE Rückversicherungs-AG,  
Direction pour la France  
31, rue Jean Giraudoux  
F- 75116 Paris  
Tel.: +33 1 40 67 21 00  
Fax: +33 1 45 00 30 75  
Contact person: Ralph Büniger  
E-Mail: [ralph.buenger@globalre.com](mailto:ralph.buenger@globalre.com)

[top](#)

**Germany**

GLOBALE Rückversicherungs-AG  
Im Mediapark 4b  
D- 50670 Cologne  
Tel.: +49 221 2889 0  
Fax: +49 221 2889 407

[top](#)

**Italy**

GLOBALE Rückversicherungs-AG,  
Rappresentanza Generale per l'Italia  
Via A. Appiani 12  
I- 20121 Milan  
Tel.: +39 02 63 614 1  
Fax: +39 02 63 614 310  
Contact person: Franco Monza  
E-Mail: [franco.monza@globalre.com](mailto:franco.monza@globalre.com)

[top](#)

**Malaysia**

GLOBAL Reinsurance Company  
Malaysia Branch  
Level 29, Wisma Goldhill  
67, Jalan Raja Chulan  
MAL- 50200 Kuala Lumpur  
Tel.: +60 3 2039 2929  
Fax: +60 3 2039 2900  
Contact person: Alan Chong  
E-Mail: alan.chong@globalre.com

[top](#)

**Spain**

GLOBALE Rück  
Sucursal en España  
C/. Marques de Cubas, 25 5ª Planta  
E-28014 Madrid  
Tel.: +34 91 360 1030  
Fax: +34 91 429 5412  
Contact person: Ignacio Dominguez  
E-Mail: ignacio.dominguez@globalre.com

[top](#)

**Switzerland**

GLOBALE Rückversicherungs-AG  
Industriestr. 18  
CH-6301 Zug  
Tel.: +41 41 726 2626  
Fax: +41 41 726 2627  
Contact person: Michael Meyer  
E-Mail: michael.meyer@globalre.com

[top](#)

**United Kingdom**

GLOBAL General and Reinsurance Company Ltd.  
GLOBAL General and Reinsurance Services Ltd.  
50 Fenchurch Street  
London  
EC3M 3JY  
Tel.: +44 20 7173 3300  
Fax: +44 20 7173 3301  
Contact person: Maik Wandres  
E-Mail: Maik.Wandres@globalre.uk.com

[top](#)

**USA**

GLOBAL Reinsurance Corporation of America  
20th Floor  
1345 Avenue of the Americas  
New York, N.Y. 10105  
USA  
Tel.: +1 212 754 7500  
Fax: +1 212 821 0498  
Contact person: Bard E. Bunaes  
E-Mail: mailto:bard\_bunaes@ggrca.com

[top](#)